



MICHAEL P. LOWRY, ESQ.
Nevada Bar No. 10666
E-mail: Michael.Lowry@wilsonelser.com
6689 Las Vegas Boulevard South, Suite 200
Las Vegas, NV 89119
Tel: 702.727.1400/Fax: 702.727.1401
Attorneys for Steven T. West; Blake Reidhead, Inc.

DISTRICT COURT
CLARK COUNTY, NEVADA

Gary Bernstein

Plaintiff,

vs.

Blake Reidhead, Inc. d/b/a BDR Transport; Steven
Thomas West; Does I through XX, inclusive; and
Roe Business Entities I through XX, inclusive,

Defendants.

Case No.: A-21-827324-C
Dept. No.: 29

Defendants' Answer to Complaint

1. Admit.
2. BDR Transport admits it does business in Nevada but denies the remaining allegations.
3. Admit.
4. Defendants lack knowledge sufficient to determine the accuracy of the allegations in this paragraph, so they deny them.
5. Defendants repeat their responses to the prior paragraphs.
6. Defendants lack knowledge sufficient to determine the accuracy of the allegations in this paragraph, so they deny them.
7. Defendants admit Mr. West was driving a BDR vehicle but deny the remaining allegations.
8. BDR admits it owned and controlled the vehicle, but denies the remaining allegations.
9. Admit.
10. Admit.

1 11. Defendants lack knowledge sufficient to determine the accuracy of the allegations in this
2 paragraph, so they deny them.

3 12. Defendants repeat their responses to the prior paragraphs.

4 13. Deny.

5 14. Deny.

6 15. Deny.

7 16. Deny.

8 17. Deny.

9 18. Deny.

10 19. Defendants repeat their responses to the prior paragraphs.

11 20. BDR admits it owned and controlled the vehicle, but denies the remaining allegations.

12 21. Deny.

13 22. Deny.

14 23. Admit.

15 24. BDR admits Mr. West was within the course and scope of his employment, but it denies the
16 remaining allegations as to others in this paragraph.

17 25. Deny.

18 26. BDR admits Mr. West was within the course and scope of his employment, but it denies the
19 remaining allegations in this paragraph.

20 27. Deny.

21 28. Deny.

22 29. Deny.

23 30. Deny.

24 31. Defendants repeat their responses to the prior paragraphs.

25 32. Deny.

26 33. Deny.

27 34. Deny.

Affirmative Defenses

1. Plaintiff was comparatively negligent.
2. Mr. West encountered a sudden emergency.
3. The event at issue was caused by a third-party.
4. Plaintiff has not mitigated damages.

Request for Relief

Defendants request the complaint be dismissed with prejudice.

DATED this 29th day of January, 2021.



BY: /s/ Michael Lowry

MICHAEL P. LOWRY

Nevada Bar No. 10666

6689 Las Vegas Boulevard South, Suite 200

Las Vegas, NV 89119

Tel: 702.727.1400/Fax: 702.727.1401

Attorneys for Steven T. West; Blake Reidhead, Inc.

Certificate of Service

Pursuant to NRCP 5, I certify that I am an employee of Wilson Elser Moskowitz Edelman & Dicker LLP, and that on January 29, 2021, I served **Defendants' Answer to Complaint** as follows:

- ☐ by placing same to be deposited for mailing in the United States Mail, in a sealed envelope upon which first class postage was prepaid in Las Vegas, Nevada;
- ☒ via electronic means by operation of the Court's electronic filing system, upon each party in this case who is registered as an electronic case filing user with the Clerk;

Ladah Law Firm 517 S. 3 rd St. Las Vegas, NV 89101 Attorneys for Gary Bernstein	
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BY: /s/ Michael Lowry
An Employee of



Ruder, Sonya

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Service Contacts	Gary Bernstein: Ramzy Ladah, Esq. (litigation@ladahlaw.com) Natalie Stevenson (natalie@ladahlaw.com) Blake Reidhead Inc.: Michael Lowry (michael.lowry@wilsonelser.com) Efile LasVegas (efilelasvegas@wilsonelser.com)

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